



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
AIR AND WASTE

December 4, 2018

Mr. Steven Roach
Remediation Manager
Univar USA Inc.
5200 Bandon Court
Dublin, Ohio 43016

Re: Conditional Approval of Final Stormwater Source Control Measure Work Plan (Work Plan)
Univar USA Inc. Portland, Oregon
Administrative Order on Consent under the Resource Conservation and Recovery Act Docket No.
1087-10-18-3008(h) (Order)
EPA ID No. ORD 00922 7398

Dear Mr. Roach:

The Final Stormwater Source Control Measure Work Plan dated October 2018 (Work Plan) was submitted in response to the EPA's and Oregon Department of Environmental Quality's comments on the draft version of the Work Plan. In accordance with Paragraph 21 of the above referenced Order, the Work Plan is conditionally approved. The approval is contingent upon Univar providing missing details on the collection and reporting of wipe sample data.

The only Standard Operating Procedure included in Appendix D, Surface Wipe Sampling SOPs, is a laboratory SOP for extraction of wipe samples to be analyzed for organic contaminants. Univar must provide additional SOPs for Appendix D that describe how the wipe samples will be collected (separate but adjacent areas must be wiped – one for organics and another for metals), how wipe samples will be digested prior to metals analysis, and how data reported from the laboratory will be converted from concentration per wipe to concentration per area units.

It is EPA's understanding that the laboratory supporting this work may be changing. If this occurs, provide a new Appendix A (Laboratory Quality Assurance Plan) to Appendix B (Quality Assurance Project Plan) in a cover letter documenting the change in laboratory support.

The EPA noted the following in the Work Plan. Further revision to the Work Plan is not required in response to these notes:

1. Section 1.3: there are now seven appendices.
2. Section 3.3.3: it was not possible for the EPA to approve the Work Plan in September as it was not received until October 2.
3. Table 4: presumably the sample location for DB-3-Source Wipe is Drainage Basin 3 not Drainage Basin 1.
4. Section 4.1.4 of Appendix F, paragraph at the top of page 19 – DEQ should be EPA.

Submit the additional wipe sampling SOPs, and, if applicable, new Laboratory QAP at least two weeks prior to the start of sampling activities. Please contact me with any questions by e-mail at castrilli.laura@epa.gov or by telephone at (206) 553-4323.

Sincerely,

12/4/2018

X



Signed by: LAURA CASTRILLI
RCRA Project Coordinator

cc: Ms. Tiffany Yelton-Bram
ODEQ

Ms. L. Alexandra Liverman
ODEQ

Ms. Cindy Ryals
City of Portland

Messrs. Brendan Robinson, Dave Edwards, Erik Ipsen and Dylan Stankus ERM-West, Inc.